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MAURA T. HEALEY
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KIMBERLEY DRISCOLL
Lieutenant Governor

GINA K. KWON
Secretary

May 11, 2026

Firearm Control Advisory Board

Meeting #14 Notice

Meeting Date: May 14, 2026
Meeting Time: 10:00 a.m. – 12:00 p.m.
Meeting Location: Massachusetts Division of Fisheries and Wildlife, 1 Rabbit Hill Road, Westborough, MA 01581

Agenda

1. Call to Order
2. Review and approval of prior meeting minutes (pgs. 1-6)
3. Update regarding the board's recommendation to the Secretary of EOPSS regarding the prohibited "assault-style firearms" roster
4. Discussion of Handgun Sales Regulation as it relates to the Approved Firearms Roster (pgs. 7-16)
5. Review and approval of test reports for handgun roster additions:
    a. Elements U.S. Space & Defense
        i. Sig Sauer, 365AXGCA-9- Legion-MS-MA, 9mm (pgs. 17-23)
        ii. Springfield Armory, PX9117LAOS, 9mm (pgs. 24-30)
        iii. Springfield Armory, PX9119LAOS, 9mm (pgs. 31-37)
        iv. Springfield Armory, PX9123L, 9mm (pgs. 38-44)
        v. Springfield Armory, PX9124L, 9mm (pgs. 45-51)
        vi. Springfield Armory, PC9105LCA18, .45 ACP (pgs. 52-58)
        vii. Springfield Armory, XDDG9101BLC-M4, 9mm (pgs. 59-65)
6. Discussion regarding certification request from Susquehanna Labs (pgs. 66-76)
7. Discussion of future meeting dates
8. Discussion of items not reasonably anticipated prior to posting the agenda
9. Member Comments
10. Public Comments
11. Adjourn

If any member of the public wishing to attend this meeting seeks special accommodation in accordance with the Americans with Disabilities Act, please contact John Melander at John.Melander@mass.gov

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Firearms Control Advisory Board (FCAB) Meeting
Thursday, April 2, 2026
Massachusetts Information Technology Center (MITC)
200 Arlington Street, Chelsea, MA 02150
DRAFT MEETING MINUTES

Members in Attendance:

- Michaela Dunne (Chairperson)
- Chief Ronald Glidden (Ret.)
- James (Jim) Wallace
- Judge (Ret.) Michael Fabbri
- Trooper Christopher Call

Non-Members in Attendance:

- Secretary Gina Kwon, Executive Office of Public Safety and Security
- John Melander, EOPSS Deputy General Counsel
- Aimee Conway, EOPSS
- Adrian Hatch, EOPSS
- Robert Vespa, EOPSS
- Agapi Koulouris, EOPSS
- Peter Geraghty, EOPSS
- Karla Aguilar, EOPSS

I. Call to Order:

Chairperson Dunne called the meeting to order at 10:12 AM.

II. Review and Approval of Prior Meeting Minutes (pgs. 1–5):

Judge Fabbri made a motion to approve the meeting minutes from February 27, 2026. Chief Glidden seconded the motion. A roll call vote was taken and the motion carried unanimously.

III. Update Regarding the Board's Recommendation to the Secretary of EOPSS Regarding the Prohibited "Assault-Style Firearms" Roster:

Attorney Melander provided an update to the Board, reporting that the Board's recommendation has been transferred to the Secretary. He noted that he still intends to brief the Secretary on the full roster. Once the Secretary approves the recommendation, it will be posted online for public viewing, and any public comments or suggestions will be brought back to the Board for consideration.

Secretary Kwon thanked the Board and indicated that she anticipates approving the recommendation but needs additional time for review, noting that this is her first time going through this process.

IV. Discussion Concerning Updating Laboratory Testing Forms:

Peter Geraghty reported to the Board that the new web-based forms are now live within the Laboratory Case Management System (LCMS). Laboratories are now able to access and submit testing forms directly through the system, replacing the prior paper-based process.

Mr. Wallace asked whether the Board should publicly clarify that the forms are intended for laboratory use rather than for individuals seeking to request the addition of firearms to the roster. Chairperson Dunne stated that she did not believe such clarification was necessary, noting that only on rare occasions has someone outside of a laboratory submitted such a request. Trooper Call suggested adding a notation indicating that the participating laboratories meet all of the Board's criteria. Chairperson Dunne agreed.

V. Discussion of Handgun Sales Regulations as They Relate to the Approved Firearms Roster (pgs. 6–11):

Chairperson Dunne noted that the Board had begun this discussion at the prior meeting and that Chief Glidden had since prepared a written summary, which was distributed to all Board members. Chairperson Dunne indicated that the Board would receive a brief overview at this meeting and that the matter would likely be tabled for further discussion at the next meeting.

Chief Glidden explained that his summary seeks to analyze the differences between the approved handgun roster and the Attorney General's handgun sales regulations. He reported that the statutory tests applicable to the roster are identical to those set forth in the handgun sales regulations, so there is no conflict between the two with respect to testing. The only meaningful conflict concerns Item 6, which addresses the sale of handguns without child-proofing safety devices, a requirement found in the Attorney General's regulations but not in the roster statute.

Chief Glidden suggested a process by which manufacturers would submit an affidavit attesting that the make and model complies with the child-proofing requirements. If the affidavit met the satisfaction of the Attorney General's Office, Brian could relay that information to the Board, and the Board could then note in the roster that the make and model both meets the statutory requirements and complies with the Attorney General's regulatory requirements. He recommended that members review the summary in advance of further discussion at the next meeting.

Judge Fabbri asked whether the Board contemplated a look-back mechanism for firearms already on the roster. Chief Glidden responded that the Board could send notice to manufacturers whose firearms are currently on the roster explaining the new process, after which the manufacturer could take the step of submitting the affidavit to the Attorney General's Office. Judge Fabbri

then asked whether this could be incorporated into the Board's existing process. Chief Glidden replied that it could not, because the Board does not have statutory authority over the Attorney General's regulations, so any such arrangement would need to be by agreement.

Attorney Melander observed that adding a process of this kind would also help make clear to firearm dealers that they must comply with both the statute (governing the roster) and the Attorney General's regulations. He noted that this is a good time to raise the issue with the Attorney General's Office. Trooper Call commented that dealers circumvent this requirement on a regular basis through legal means. Mr. Wallace raised a concern that adding a notation regarding compliance with the Attorney General's regulations could create legal uncertainty, as it could be read to imply that any approved firearm without the notation is illegal to sell.

Chairperson Dunne indicated that the discussion would be added to the agenda for the next meeting. Chief Glidden and Attorney Melander both indicated that they would reach out to Brian at the Attorney General's Office in the interim.

VI. Review and Approval of Test Report for Handgun Roster Additions:

The Board reviewed test reports from Professional Analysis and Consulting, Inc. for the following firearms:

Heckler & Koch, VP9X, 9mm Luger (pgs. 12–19)

Chairperson Dunne introduced the test report and asked if there was any discussion. There was none. Trooper Call made a motion to approve the addition. Judge Fabbri seconded the motion. A roll call vote was taken and the motion carried unanimously.

Smith & Wesson, 940 Carry 9mm (pgs. 20–27)
Smith & Wesson, PC M&P 10mm Carry Comp TS (pgs. 28–35)
Smith & Wesson, PC Shield X Carry Comp 9mm, 3.6" (pgs. 36–43)

Chairperson Dunne introduced the three Smith & Wesson test reports together. Chief Glidden asked whether the Model 940 is a revolver. Trooper Call confirmed that it is, with a 2.9-inch barrel. There was no further discussion. Trooper Call made a motion to approve the additions collectively. Judge Fabbri seconded the motion. A roll call vote was taken and the motion carried unanimously.

VII. Review and Approval of Petition for Addition to the Formal Target Shooting Roster:

Chairperson Dunne noted that she had received all of the signed affidavits requested by the Board at the last meeting from SIG Sauer.

Firearm SKU: 211F-9-GT5-RXSL-10 (pgs. 44–46)

Judge Fabbri asked whether the Board should be inquiring about which publications the supporting materials appear in. Chief Glidden responded that the Board should not, because some petitioners do not have publications and instead rely on online materials and other sources. Trooper Call added that the manufacturer recently demonstrated this firearm for the Massachusetts State Police, and that it is a sister firearm to a model approved by the Board several months ago. He noted that the petitioned model differs primarily in that it does not include a compensator, which some shooters prefer. Trooper Call made a motion to approve the

addition. Judge Fabbri seconded the motion. A roll call vote was taken and the motion carried unanimously.

VIII. Discussion of Future Meeting Dates:

The Board confirmed that the next meeting will be held on Wednesday, May 14, 2026, at the Department of Fish and Wildlife Headquarters in Westborough. The Board also scheduled a meeting for Friday, June 12, 2026, to be held at DCJIS.

IX. Discussion of Any Items Not Reasonably Anticipated Prior to Posting the Agenda:

Chief Glidden noted that the Board is in the process of revising the introductory language on the rosters to ensure that it accurately references the relevant testing locations and standards.

X. Member Comments:

Judge Fabbri welcomed Secretary Kwon to the meeting.

Mr. Wallace addressed the Board regarding the implementation of new firearm safety training requirements, which took effect on April 2, 2026. He noted that GOAL has put in significant time and resources working to implement the training requirements and has been coordinating with Sergeant Burns of the Massachusetts State Police, but that the live-fire component is still not in place. He further reported that local licensing authorities have begun stating that they will not approve license applications without proof of completion of the state's live-fire training.

Chief Glidden asked Mr. Wallace whether the safety courses GOAL submitted include a live-fire component, suggesting that instructors could include their own live-fire instruction now and adjust their curriculum once the state's standards are issued. Mr. Wallace responded that this approach does not solve the problem, as instructors do not currently know what is required, and local licensing officers are refusing to accept safety certifications. Chief Glidden noted that information has been released indicating exactly what is required, and that certificates issued prior to April 2, 2026 remain valid. He reiterated that instructors have been provided with instructions and need to follow them.

Attorney Melander reported that, on March 26, 2026, EOPSS sent an email to all licensing authorities in the Commonwealth notifying them that BFS course certificates for courses completed prior to April 2, 2026 should be accepted, and that the new course requirements only apply to individuals who complete a BFS course on or after April 2, 2026. He stated that local agencies have been informed.

Mr. Wallace responded that this guidance does not address the issue concerning Firearm Identification Card (FID) courses, which are generally not live-fire courses and which currently lack any standards for incorporating live-fire instruction. Attorney Melander explained that EOPSS has sent a letter to instructors with usable guidance and emphasized that the live-fire component does not have a April 2, 2026 deadline. For the time being, instructors are only required to cover the three new academic areas in courses they teach. Live-fire is not required until the corresponding standards are implemented through public hearing, and EOPSS intends to move slowly and deliberately on that piece. He noted that the agency received useful feedback at the recent live-fire hearings, particularly concerning soil contamination and the use of simulators.

Chief Glidden raised a related question concerning the original regulation governing safety courses, which was written when Class A and Class C licenses to carry existed and which provided that an individual was not required to take a new course in order to upgrade from one license type to another. He asked whether, under the current framework, an individual who takes a course to obtain an FID would be required to take an additional course in order to obtain an LTC. Attorney Melander indicated that he believes this issue is addressed in the current guidance and that EOPSS's aim is to make the process less onerous within the bounds of the law.

Mr. Wallace asked whether EOPSS would issue an official memorandum stating that live-fire is not required until it is implemented. Attorney Melander indicated that EOPSS could issue such a memorandum to provide additional clarity. Mr. Wallace stated that GOAL is receiving many questions from the field because local authorities are creating their own rules. Attorney Melander recommended that such questions be funneled through the State Police Firearms Compliance Unit, which maintains a designated email address for these communications, and added that EOPSS, working through MPTC, can play a role in reminding local departments of the guidance that has already been issued.

Mr. Wallace noted that he had recently renewed his own license and that the paperwork he received was outdated by at least two years. Chairperson Dunne responded that the materials are in the process of being updated.

Chief Glidden suggested that it would be helpful to send a letter to chiefs identifying which existing courses already include a live-fire component.

Mr. Wallace stated that the licensing delays at the local level are unacceptable and raised constitutional concerns regarding deprivation of rights.

Judge Fabbri suggested that, once all live-fire courses have been approved, EOPSS communicate that information broadly so that instructors and licensing authorities know where to find the approved list. Attorney Melander responded that the approved courses will be posted on Mass.gov, and that EOPSS can issue rolling updates through MPTC to chiefs every two weeks as additional courses are approved.

Judge Fabbri then asked whether, once the BFS courses are all approved, a comprehensive list of approved courses would be sent to the chiefs. Attorney Melander confirmed that it would. Chief Glidden asked whether there would be communication indicating that the licensing officer trainings are required. Attorney Melander responded that there would not.

Mr. Wallace concluded by reporting that local police departments are refusing to accept license applications submitted through the MIRCS portal, which he characterized as part of broader delay tactics with respect to firearms licenses. Chairperson Dunne stated that the Board has not received reports of this issue and asked Mr. Wallace to provide specific information so that it can be addressed.

XI. Public Comments:

No members of the public were in attendance.

XII. Adjournment:

Trooper Call made a motion to adjourn the meeting. Judge Fabbri seconded the motion. A roll call vote was taken and the motion carried unanimously. The Board meeting was adjourned at 10:58 AM.

Report on the Similarities and Differences Between Handgun Sales Regulations and the Approved Firearms Roster

Purpose: This report seeks to analyze the similarities and differences between handgun sales regulations and the *Approved Firearms Roster*. For over 25 years, confusion has persisted regarding the regulations and the roster. The lack of a definitive list of handguns compliant with the regulations has contributed to this confusion. Even the introductory language on the *Approved Firearms Roster* notes, "Firearms on this Approved Firearms Roster do not necessarily comply with the requirements of the Attorney General's Handgun Sales Regulations." To navigate this uncertainty, many dealers have resorted to creative methods to sidestep the regulations (and the 2004 consumer advisory). Unfortunately, these practices tend to inflate consumer costs without achieving the regulations' intended safety objectives.

The primary purpose of this report is to explore the possibility of reconciling these differences without the need to rewrite any statutes or regulations. Additionally, it aims to harmonize the regulations with the roster to foster greater compliance among dealers.

Background:

1997-1998

940 CMR 16.00 Handgun Sales

16.02: ***Unfair or Deceptive Practices.*** Dealer practices not related to handgun manufacturing, materials, or malfunctions, so not part of this report.

16.03: ***Tamper-Resistant Serial Numbers.*** Addressed in detail by legislation in 2024 (MGL c.140, §121C) so not part of this report.

16.04: ***Sale of Handguns Made from Inferior Materials.*** Requires a performance test. The performance test listed is the exact same test in MGL chapter 140, §123 subsection (o)(i).

16.05: ***Sale of Handguns Without Childproofing or Safety Devices.***

1. Requires a handgun to be sold with a safety device in accordance with MGL chapter 140, § 131K. Dealer requirement so not part of this report.

2. Requires a handgun sold by a dealer to contain a mechanism that effectively precludes an average five-year-old child from operating the handgun when it is ready to fire; including but not limited to (one or more of the following):
    - raising trigger resistance to at least a ten-pound pull
    - altering the firing mechanism so that an average five-year-old child's hands are too small to operate the handgun, or
    - requiring a series of multiple motions in order to fire the handgun (i.e. hammer deactivation device).

3. Requires a handgun loaded via a magazine (i.e. semiautomatic) to have a load indicator or a magazine safety disconnect.

16.06: Requires a safety warning disclosure. Dealer requirement so not part of this report.

1998

The current *Approved Firearms Roster* has its origins in Section 19 of Chapter 180 of the Acts of 1998, codified at MGL, chapter 140, § 123, which was enacted in October 1998 after 940 CMR 16.00 was promulgated.

501 CMR 7.00 was subsequently promulgated by EOPSS, with input from the GCAB, to establish independent, approved testing laboratories and to standardize testing and submission procedures.

2024

Chapter 135 of the Acts of 2024 changed the location of the testing requirements in MGL c. 123, but did not substantially change the wording or testing procedures.

§123 Subsection (o)(i): A provision to prohibit dealer sales of firearms with inferior materials. The exemption requires specific testing demonstrating that the firearm would not crack, break, or malfunction.

§123 Subsection (o)(ii): A provision to prohibit dealer sales of firearms prone to accidental discharge. The exemption requires a specific "drop test".

§123 Subsection (o)(iii): A provision to prohibit dealer sales of a firearm prone to: (i) firing more than once per pull of the trigger; or (ii) exploding during firing.

§123 Subsection (o)(iv): A provision to prohibit dealer sales of a firearm with a barrel less than 3" unless it passes a specified accuracy test.

Tests

***Malfunction Firing Test* as set forth in M.G.L c. 140, §123 Subsection (o)(i):**

- Three handguns
- Fired the first 20 rounds without a malfunction.
- Fired the full 600 rounds with no more than 6 malfunctions and completed the test without a crack or breakage that increases the danger to the user.

***Accidental Discharge Drop Safety Test* as set forth in M.G.L c. 140, §123 Subsection (o)(ii):**

- Five handguns
- Dropped onto a solid concrete slab from a height of 1 meter and did not discharge during any of the following drop tests as set forth in M.G.L. c. 140, § 123 clause 19.
- Drop #1: Normal firing position (barrel horizontal)
- Drop #2: Upside down (barrel horizontal)
- Drop #3: On grip (barrel vertical)
- Drop #4: On muzzle (barrel vertical)
- Drop #5: On either side (barrel horizontal)
- Drop #6: On exposed hammer or striker or, if none exist, on the rearmost part of the firearm.

***Prone to Multiple Shots or Explosion* as set forth in M.G.L. c. 140 § 123 Subsection (o)(iii):**

- Handgun is not prone to either firing more than once per pull of the trigger or explosion during firing
- A handgun is "prone to" either of these occurrences if it takes place at any time during the 600-round Firing Test.

For Consideration by the FCAB

1. The drop test defined in 940 CMR 16.01 is the same test listed in MGL chapter 140, §123 subsection (o) (ii).

2. The performance test in 940 CMR 16.01 is the same test listed in MGL chapter 140, §123 subsection (o) (i).

3. The "not being prone to repeated firing or explosion" requirement in 940 CMR 16.04(2) is the same requirement listed in MGL chapter 140, §123 subsection (o) (iii).

4. The FCAB requires successful completion of these tests for roster consideration.

5. All other sections of 940 CMR 16.00 focus on dealer practices at point-of-sale and are beyond the scope of the roster evaluation process for individual handgun models.

6. The remaining obstacle to determining if a handgun model listed on the *Approved Firearms Roster* is also in compliance with regulations is whether that model meets the requirements in 16.05, *Sale of Handguns Without Childproofing or Safety Devices*.

Though the FCAB lacks statutory authority over 940 CMR 16.00, the presence of an AGO representative on the Board creates a unique opportunity to eliminate obstacles and align the roster with applicable regulations. This alignment would not only clarify which models dealers can legally sell but also promote voluntary compliance with both the regulations and relevant statutes.

A Possible Documentation Process for Consideration

The following documentation process relates only to handgun model manufacturing, materials, malfunctions, and child safety requirements as required by 940 CMR 16.00:

1. The manufacturer submits an affidavit to the AGO attesting that a model on the *Approved Firearms Roster* also complies with 16.05(2). Such an affidavit includes a description of one or more of the following:
    - The model has a trigger pull resistance of at least ten pounds
    - The model has a firing mechanism so that an average five-year-old child's hands are too small to operate the handgun (and includes a description of that feature)
    - The model requires a series of multiple motions in order to fire the handgun, such as a hammer deactivation device (and includes a description of that feature).

2. For semiautomatic handguns, the manufacturer also supplies with the affidavit, an owner's manual, or relevant portions of that manual, describing the load indicator or magazine safety disconnect required in 16.05(3). Requiring the owner's manual describing the required items would eliminate the need for subjective evaluations.

If the AGO determined the documentation was sufficient to comply with 16.05, the AGO representative to the FCAB could notify the FCAB at a regularly scheduled meeting, and the Board could recommend a notation on the *Approved Firearms Roster* indicating compliance.

If a formal process were implemented, the FCAB could reach out to manufacturers of models currently on the *Approved Firearms Roster* to share details about the compliance process. Subsequently, each manufacturer could choose whether to take advantage of this option, potentially allowing any model already on the roster to be marked as compliant with the regulation.

Recommendation

I recommend that the FCAB ask either the EOPSS General Counsel or the AGO representative on the Board to ask the AGO whether they would be amenable to establishing a formal process enabling the Board to indicate on the *Approved Firearms Roster* which models also comply with their Handgun Sales regulations.

940 CMR 16.00: HANDGUN SALES

Section

16.01: Definitions
16.02: Unfair or Deceptive Practices: General
16.03: Tamper-Resistant Serial Numbers
16.04: Sale of Handguns Made From Inferior Materials
16.05: Sale of Handguns Without Childproofing or Safety Devices
16.06: Safety Warning/Disclosures
16.07: Transfers of Used Handguns
16.08: Severability
16.09: Enforcement Dates

The Attorney General of the Commonwealth of Massachusetts promulgates 940 CMR 16.00 pursuant to authority granted to him under M.G.L. c. 93A, § 2(c). 940 CMR 16.00 defines certain unfair acts or practices but is not intended to describe all types of practices prohibited by M.G.L. c. 93A, § 2. 940 CMR 16.00 does not legitimize acts that are not specifically prohibited by 940 CMR 16.00, and does not alter or amend common law rights and remedies available to consumers. 940 CMR 16.00 is designed to supplement existing statutes and regulations. References to statutes and other regulations shall include amendments thereto from time to time.

16.01: Definitions

For purposes of 940 CMR 16.00, the following terms shall have the following meanings:

Average group diameter test result: shall mean the arithmetic mean of three separate group diameter test results taken from a set distance.

Combination handle lock: shall mean a device which precludes the use of the handgun unless the combination tumblers are properly aligned. This device may, for example, have the numbers for the combination tumblers protrude from the handle of the handgun.

Educational collector: shall mean an individual who is properly licensed as a bonafide collector pursuant to 520 CMR 7.00, and whose collection is maintained for purposes of display, research, lecturing, demonstration, or historical significance, as opposed to being maintained for personal enjoyment and/or possible future profit.

Group diameter test result: shall mean the largest spread in inches between the centers of any of the holes made in a test target after firing five rounds from the handgun in question at the target from a set distance. The ammunition used shall be the type recommended by the handgun manufacturer in its user manual, or if none is recommended, any standard ammunition of the correct caliber in new condition.

Hammer deactivation device: shall mean a built-in device (or an extension of the hammer) which allows a user manually to lower the handgun's hammer into a deactivated position, and which must be manually re-toggled in order to re-cock the hammer before the handgun can be fired.

Handgun: shall mean a weapon, designed to be fired by the use of a single hand, from which may be fired or ejected one or more solid projectiles propelled via a chemical ignition, and which has:

(a) a smooth bore with a barrel less than 18 inches long;
(b) a smooth bore and an overall weapon length of less than 26 inches; or
(c) a rifled bore with a barrel less than 16 inches.

16.01: continued

Handgun Drop Test: shall mean a test in which the handgun in question shall be:

(a) test loaded;

(b) set such that the handgun is ready to fire; and

(c) dropped onto a solid slab of concrete from a height of one meter from each of the following positions:

1. normal firing position,
2. upside down,
3. on grip,
4. on the muzzle,
5. on either side, and
6. on the exposed hammer or striker (or if there is no exposed hammer or striker, then the rearmost part of the firearm).

In addition, if the handgun is designed so that its hammer or striker may be set in other positions, the handgun in question shall be tested with the hammer or striker in each such position (but otherwise ready to fire). Alternatively, the tester may use different handguns of the same make and model, in similar condition, for the test of each of these hammer/striker settings.

Handgun Performance Test: shall mean a test in which the handgun in question shall fire 600 rounds, stopping every 100 rounds to tighten any loose screws and to clean the gun (if required by the cleaning schedule in the user manual), and as needed to refill the empty magazine or cylinder to capacity before continuing. For any handgun that loads other than via a detachable magazine, the tester shall also pause every 50 rounds for ten minutes. The ammunition used shall be the type recommended by the handgun manufacturer in its user manual, or if none is recommended, any standard ammunition of the correct caliber in new condition. A handgun shall pass this test if it:

(a) fires the first 20 rounds without a malfunction, and

(b) fires the full 600 rounds with no more than six malfunctions and without any crack or breakage of an operating part of the handgun which increases the danger of injury to the user.

Handgun-purveyor: shall mean any person or entity that transfers handguns to a customer located within the Commonwealth of Massachusetts. However, handgun-purveyor shall not include any of the aforementioned if:

(a) the person or entity transfers less than five handguns per year,

(b) the transfer in question is for the purpose of, and does, directly or indirectly, supply law enforcement officials or United States military personnel with handguns for their official duties,

(c) the transfer in question is for the purpose of, and does, directly or indirectly, supply museums or educational collectors with the handguns in question,

(d) the transfer in question is undertaken to, and does, result in the surrender of handguns to military or law enforcement personnel,

(e) the transfer in question is of handguns that qualify as antique firearms as defined in 18 U.S.C. § 921, or

(f) the transfer in question is of handguns that are solely designed and sold specifically for formal target shooting competition.

Key activated trigger lock: shall mean a device that when locked in place by means of a key, prevents a potential user from pulling the trigger of the handgun without first removing the trigger lock by use of the trigger lock's key.

Load indicator: shall mean a device which plainly indicates that a cartridge is in the firing chamber within the handgun.

Magazine safety disconnect: shall mean a device that prevents the firing of the handgun when the magazine is detached from the handgun.

Make and model: shall mean any group of handguns, all of which are made by a manufacturer by the same method and according to the same design pattern and specifications.

16.01: continued

Make and Model Performance Requirements: shall mean a test in which three handguns in new condition of the make and model being tested shall each pass the Handgun Performance Test.

Make and Model's Average Group Diameter Test Result: shall mean the arithmetic mean of the results of three Average Group Diameter Tests, each performed on a different handgun in new condition of the make and model being tested.

Malfunction: shall mean any failure to feed, chamber, fire, extract, or eject a round, or any failure to accept or eject a magazine, or any other failure which prevents the handgun, without manual intervention beyond that needed for routine firing and periodic reloading, from firing the chambered round or moving a new round into position so that the handgun is capable of firing the new round properly. Malfunction shall not include a misfire caused by a faulty cartridge whose primer fails to detonate when properly hit by the handgun's firing mechanism.

Passive use-limitation device: shall mean a device that automatically resets itself so that an unauthorized user cannot fire the handgun. As an example, a key activated trigger lock is not a passive use-limitation device because it needs to be re-locked manually after its key is used to unlock it; thus the next user can fire the handgun without having to unlock the handgun.

Prone to accidental discharge: shall mean unable to pass the following test: five handguns in new condition of the make and model in question shall each be subjected to, and none shall discharge during, the Handgun Drop Test.

Ready to fire: shall mean loaded, and in a condition such that pulling the trigger (and taking any action that must simultaneously accompany the pulling of the trigger as part of the firing procedure) will fire the handgun.

Serial number: shall mean the number stamped, inscribed, or placed upon a handgun by a handgun-purveyor pursuant to M.G.L. c. 269, § 11E.

Solenoid use-limitation device: shall mean a device which precludes, by use of a magnetically activated relay, the firing of the handgun unless a magnet of the appropriate strength is placed in proximity to the handle of the handgun. Such magnet may be imbedded in a ring which can be worn on the user's gun hand.

Test loaded: shall mean loading each chamber of the handgun in question with an empty case with a primer installed.

Transfer: shall mean sell, rent, or lease. Transfer shall not include a sale to a business entity that is primarily a firearm wholesaler, so long as the sale, by its terms, prohibits the purchaser from reselling the handgun to a handgun retailer or consumer in the Commonwealth.

16.02: Unfair or Deceptive Practices: General

(1) It shall be an unfair or deceptive practice for any handgun-purveyor, in conjunction with the transfer (or offer to transfer) of a handgun to a consumer in the Commonwealth, to fail to comply with M.G.L. c. 93A, 940 CMR 16.00 *et seq.*, or any other existing local, state, or federal statute, rule or regulation whose implementation serves to protect consumers from unfair and deceptive practices by means including, but not limited to, regulating conditions of sale, precluding the sale of products when such sale will place purchasers in violation of the law, demanding the disclosure of information, and ensuring the satisfactory condition and non-contraband status of goods proffered for sale. Examples of the above include laws, regulations, and rules that:

(a) forbid the sale of handguns to juveniles, addicts, or mentally incompetent individuals,
(b) forbid the sale of silencers, armor penetrating bullets, or machine-gun pistols (when possession by purchasers will be unlawful),
(c) forbid participation in any way in the obliteration of serial numbers from handguns prior to sale,
(d) forbid the sale of handguns whose serial numbers have been defaced,

16.02: continued

(e) require sellers to keep records of handgun sales,
(f) forbid sellers from delivering or transporting handguns loaded, or
(g) forbid the delivery of handguns to the custody of a minor.

(2) It shall be an unfair or deceptive practice for a handgun-purveyor to make material misrepresentations or make false certifications regarding any handgun offered for transfer.

16.03: Tamper-Resistant Serial Numbers

It shall be an unfair or deceptive practice for a handgun-purveyor to transfer or offer to transfer to any customer located within the Commonwealth any handgun on which the serial number has been placed solely in a location on the handgun that results in the number's susceptibility to eradication. A serial number shall be deemed not susceptible to eradication for purposes of 940 CMR 16.00 if:

(1) it is placed on the interior of the handgun, and the handgun-purveyor provides information regarding the location of the interior serial number to the Office of the Attorney General and other law enforcement officials upon request; or

(2) it is placed on the exterior of the handgun in a way that is not visible to the unaided eye, but is visible with the aid of an infrared detector or other device, and the handgun-purveyor provides information regarding the location of the nonvisible serial number or any method by which this number can be made viewable to the Office of the Attorney General and other law enforcement officials upon request.

16.04: Sale of Handguns Made From Inferior Materials

It shall be an unfair or deceptive practice for a handgun-purveyor to transfer or offer to transfer to any customer located within the Commonwealth any make and model of handgun that:

(1) has a frame, barrel, cylinder, slide or breechblock:
(a) composed of any metal having a melting point of less than 900°F,
(b) composed of any material having an ultimate tensile strength of less than 55,000 pounds per square inch, or
(c) composed of any powdered metal having a density of less than 7.5 grams per cubic centimeter; or

(2) is prone to repeated firing based on a single pull of the trigger, prone to the explosion of the handgun during firing with standard ammunition, or prone to accidental discharge.

(3) 940 CMR 16.04(1) shall not apply to any make and model of handgun which satisfies the Make and Model Performance Requirements. The Attorney General may require that the handgun-purveyor, or the entity testing the make and model in question on behalf of the handgun-purveyor, provide a sworn certification verifying that the make and model met the performance requirements. At the Attorney General's discretion, he may, upon 60 days notice, require that any such test be performed again by an independent testing entity chosen by the Attorney General, upon three test guns of the make and model purchased at retail. In such a case, the prior certification shall be prospectively invalid at the conclusion of the notice period and the make and model in question may henceforth only meet the Make and Model Performance Requirements by obtaining a certification from the independent tester. A handgun-purveyor may resubmit a make and model to the independent tester for testing an unlimited number of times.

16.05: Sale of Handguns Without Childproofing or Safety Devices

(1) It shall be an unfair or deceptive practice to sell a handgun without a safety device in violation of M.G.L. c. 140, § 131K.

(2) It shall be an unfair or deceptive practice for a handgun-purveyor to transfer or offer to transfer to any customer located within the Commonwealth any handgun which does not contain

16.05: continued

a mechanism which effectively precludes an average five year old child from operating the handgun when it is ready to fire; such mechanisms shall include, but are not limited to: raising trigger resistance to at least a ten pound pull, altering the firing mechanism so that an average five year old child's hands are too small to operate the handgun, or requiring a series of multiple motions in order to fire the handgun.

(3) It shall be an unfair or deceptive practice for a handgun-purveyor to transfer or offer to transfer to any customer located within the Commonwealth any handgun which does not contain a load indicator or magazine safety disconnect.

(4) 940 CMR 16.05(2) shall not apply to handguns which have a hammer deactivation device. 940 CMR 16.05(3) applies only to handguns that have a mechanism to load cartridges via a magazine.

16.06: Safety Warning/Disclosures

(1) It shall be an unfair or deceptive practice for a handgun-purveyor to transfer or offer to transfer to any customer located within the Commonwealth any handgun unless that handgun is accompanied by the following warning, provided on a separate sheet of paper included within the packaging enclosing the gun, which, in at least 12 point type, states the following:

> "WARNING FROM THE MASSACHUSETTS ATTORNEY GENERAL: This handgun is not equipped with a device that fully blocks use by unauthorized users. More than 200,000 firearms like this one are stolen from their owners every year in the United States. In addition, there are more than a thousand suicides each year by younger children and teenagers who get access to firearms. Hundreds more die from accidental discharge. It is likely that many more children sustain serious wounds, or inflict such wounds accidentally on others. In order to limit the chance of such misuse, it is imperative that you keep this weapon locked in a secure place and take other steps necessary to limit the possibility of theft or accident. Failure to take reasonable preventive steps may result in innocent lives being lost, and in some circumstances may result in your liability for these deaths."

Failure to include this warning in the packaging enclosing the gun shall not be a violation of 940 CMR 16.00 if the handgun in question complies with 940 CMR 16.05(1) by means of a built-in passive use-limitation device, including but not limited to a nondetachable solenoid use-limitation device.

(2) It shall be an unfair or deceptive practice for a handgun-purveyor to transfer a handgun directly to a retail customer located within the Commonwealth without demonstrating how to load, unload, and safely store the handgun, and how to engage and disengage all safety devices on the handgun. This shall include an explanation of the circumstances for which the safety devices are designed to prevent the firing of the handgun. The handgun-purveyor shall also note for the retail customer the absence, if any, of the following: a load indicator, a magazine safety disconnect or an internal safety.

(3) It shall be an unfair or deceptive practice for a handgun purveyor to transfer to a customer located within the Commonwealth a handgun that has a barrel shorter than three inches, unless the handgun purveyor discloses the limits of the accuracy of the make and model of handgun for sale by providing in writing to the customer (prior to sale) the make and model's average group diameter test result at seven yards, average group diameter test result at 14 yards, and average group diameter test result at 21 yards.

16.07: Transfers of Used Handguns

(1) 940 CMR 16.03 and 16.05(2) and (3) shall not apply to the transfer of (or offer to transfer) any handgun that previously has been sold at retail to a consumer and that was manufactured prior to the enforcement date for those provisions.

16.07: continued

(2) 940 CMR 16.06(3) shall not apply to the transfer of (or offer to transfer) any handgun that previously has been sold at retail to a consumer, was manufactured prior to the enforcement date for 940 CMR 16.06(3), and for which the handgun-purveyor discloses the limits of the accuracy of the specific handgun for sale by providing in writing to the customer(prior to sale) the handgun's average group diameter test result at seven yards, average group diameter test result at 14 yards, and average group diameter test result at 21 yards.

(3) 940 CMR 16.04(2), as it pertains to any make and model prone to accidental discharge, shall not apply to the transfer of (or offer to transfer) any handgun that previously has been sold at retail to a consumer, was manufactured prior to the enforcement date for 940 CMR 16.04(2), and for which the handgun-purveyor provides to the buyer a sworn certification that the handgun-purveyor has performed the Handgun Drop Test on the handgun in question in fully cocked position, and on the same handgun (or on other handguns of the same make and model in similar condition) in all other hammer/striker positions, and that there were no discharges during the test.

(4) 940 CMR 16.04(1) shall not apply to the transfer of (or offer to transfer) any handgun that previously has been sold at retail to a consumer, was manufactured prior to the enforcement date for 940 CMR 16.04(1), and for which the handgun-purveyor provides a sworn certification to the buyer that the specific handgun purchased passed the Handgun Performance Test.

16.08: Severability

If any section or subsection of 940 CMR 16.00 shall be held invalid, the validity of the remainder of 940 CMR 16.00 shall not be affected thereby. If the application of any section or subsection of 940 CMR 16.00 to any person or circumstance shall be held invalid, the applicability of such section or subsection to any other person or circumstance shall not be affected thereby.

16.09: Enforcement Dates

940 CMR 16.00 shall apply as follows:

(1) 940 CMR 16.01, 16.02, and 16.08, and 940 CMR 16.06(1) and (2) shall apply to acts committed or practices in force as of January 15, 1998;

(2) 940 CMR 16.04 and 940 CMR 16.06(3), 16.07(2), (3) and (4) shall apply to acts committed or practices in force as of June 30, 1998; and

(3) 940 CMR 16.03 and 16.05, and 940 CMR 16.07(1) shall apply to acts committed or practices in force as of September 30, 1998.

REGULATORY AUTHORITY

940 CMR 16.00: M.G.L. c. 93A, § 2(c).

(PAGES 125 THROUGH 130 ARE RESERVED FOR FUTURE USE.)

Element U.S. Space & Defense Test Report

Project No.: OH000031716 Tested: 02 April 2026

Prepared For

Sig Sauer
72 Pease Boulevard
Newington, NH 03801 USA

Prepared By

Element U.S. Space & Defense | 4603B Compass Point Road | Belcamp, MD 21017 | (410) 297-8154 |
www.elementdefense.com

Revision History

Rev.	Description	Issue Date
0	Initial Release	07 April 2026

The EOPS-Certified Laboratory identified below has completed the testing requirements by Massachusetts General Law c. 140 § 123 cl. 18-21 and is submitting this Compliance Test Report. The reference number/identifier should refer specifically to the testing of a named handgun model, not to the laboratory in general. The number/identifier must be noted in the space provided on each page of this report.

EOPS-CERTIFIED LABORATORY INFORMATION

Date Submitted: April 07, 2026

EOPS-Certified Laboratory: Element U.S. Space & Defense (NTS Technical Systems)

Address:

4603B Compass Point Rd,
Belcamp, MD, 21017

Name and Telephone Number of the EOPS-Certified Laboratory staff person to be contacted regarding this report:

Joshua Petty – 667.289.8808

Date of Test: 02 April 2026 **Time of Test: 8:00 AM**

Locations(s) of Test, including any off-site locations:

Element U.S. Space & Defense
4603B Compass Point Rd,
Belcamp, MD, 21017

Name(s) and Title(s) of EOPS-Certified Laboratory Staff who conducted and/or performed the required testing:

1. Jacob Arisman- Range Lead
2. Joshua Petty- Ballistic Engineering Specialist
3. Jason Easton- Range Technician

HANDGUN MANUFACTURER INFORMATION

Name and address of manufacturer:

Sig Sauer
72 Pease Boulevard
Newington, NH 03801 USA

Name and address of entity submitting handguns for testing, if different:

HANDGUN MODEL INFORMATION

Handgun Type (check one): **Revolver:** _____ **Pistol:** __X___

Make: Sig Sauer

Model: 365AXGCA-9-Legion-MS-MA

Caliber: 9mm **Barrel Length: 3.1"**

Construction Material(s) for frame, barrel, cylinder, slide, and breechblock (e.g., stainless steel, alloy):
Stainless steel, alloy

Serial Numbers:

1. 66H133916
2. 66H133914
3. 66H133912
4. 66H133915
5. 66H133913

The manufacturer has certified in writing (attached) that each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way, and has been pre-tested only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

Yes __X__ No ____

If the handgun has been submitted by an importer, then the importer has certified in writing (attached) that each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way, and has been pre-tested only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

Yes_____ No ____

AMMUNITION/TEST LOAD INFORMATION

Ammunition Manufacturer: Sig Sauer

Caliber: 9mm

Bullet Weight and Type (i.e., FMJ, JHP, etc.): 9mm 115 gr. FMJ

Lot #: LA0131A

Used most powerful ammunition recommended in manufacturer's user manual:

Yes ___X___ No_____

Used Primed case for Drop Safety Test Most Similar to the Most Powerful Ammunition Recommended in Manufacturer's User Manual:

Yes ___X___ No_____

Primed Case Manufacturer: Sig Sauer

FIRING TEST

Each of three handguns have met both of the following conditions as set forth in M.G.L. c. 140 § 123 cl. (18):

Fired the first 20 rounds without a malfunction.

Fired the full 600 rounds with no more than 6 malfunctions and completed the test without a crack or breakage that increases the danger to the user.

DROP SAFETY TEST

Each of 5 handguns was dropped onto a solid concrete slab from a height of 1 meter and did not discharge during any of the following drop tests as set forth in M.G.L. c. 140, § 123 cl. (19):

Drop #1: Normal firing position (barrel horizontal)

Drop #2: Upside down (barrel horizontal)

Drop #3: On grip (barrel vertical)

Drop #4: On muzzle (barrel vertical)

Drop #5: On either side (barrel horizontal)

Drop #6: On exposed hammer or striker or, if none exist, on the rearmost part of the firearm.

Please note that all handguns should be tested with all manual safety off in each available hammer position. For instance, with traditional double action pistols and revolvers with exposed hammers, six drops must be done both with the hammer cocked back and in the forward position. Similarly, handguns that have a half-cocked position should be tested with the hammer cocked back, the hammer in forward position, and the hammer half-cocked.

Before each drop, the handgun must be test fired to ensure functionality.

SAFETY REQUIREMENTS as set forth in M.G.L. c. 140 § 123 cl. (20), (21

ALL HANDGUNS

Handgun is not prone to either:

Firing more than once per pull of the trigger

Explosion during firing

I declare under penalty of perjury according to the laws of the Massachusetts that this test was performed pursuant to the requirements of M.G.L. c. 140, § 123 cl. (19), 501 CMR 7.00, as further outlined in the Secretary's February 21, 2001 letter, and that all statements made in this report are true and complete

Signature: Josh A Petty

Name/Title (Printed): Joshua Petty / Ballistics Engineering Specialist

Date: 07 April 2026

MANUFACTURER'S HANDGUN CERTIFICATION FORM

Approved Firearms Roster
M.G.L. c. 140, sec. 123, cl. 18-21; 501 CMR 7.00

This form must be completed by the importer.

The following handgun samples, which accompany this Certification, are submitted for testing for purposes of the Approved Firearms Roster, M.G.L. c. 140, sec. 123, cl. 18-21, and 501 CMR 7.00:

Manufacturer: Sig Sauer

Model: 365AXGCA-9-Legion-MS-MA

Caliber: 9mm

Serial No.:

1. 66H133916
2. 66H133914
3. 66H133912
4. 66H133915
5. 66H133913

Laboratory Reference Number: OH000031716

The undersigned manufacturer certifies that:

Each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way; and

Each handgun identified above has been pre-tested by the manufacturer only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

I declare under penalty of perjury according to the laws of the Massachusetts that this test was performed pursuant to the requirements of M.G.L. c. 140, § 123 cl. (19), 501 CMR 7.00, as further outlined in the Secretary's February 21, 2001 letter, and that all statements made in this report are true and complete

Signature: _____

Name/Title (Printed):

Date: 4/21/26

Element U.S. Space & Defense Test Report

Project No.: PH00018277 Tested: 18 February 2026

Prepared For

Springfield Armory
650 Weber Dr.
Geneseo, IL 61254 USA

Prepared By

Element U.S. Space & Defense | 4603B Compass Point Road | Belcamp, MD 21017 | (410) 297-8154 |
www.elementdefense.com

Revision History

Rev.	Description	Issue Date
0	Initial Release	06 March 2026

The EOPS-Certified Laboratory identified below has completed the testing requirements by Massachusetts General Law c. 140 § 123 cl. 18-21 and is submitting this Compliance Test Report. The reference number/identifier should refer specifically to the testing of a named handgun model, not to the laboratory in general. The number/identifier must be noted in the space provided on each page of this report.

EOPS-CERTIFIED LABORATORY INFORMATION

Date Submitted: March 06, 2026

EOPS-Certified Laboratory: Element U.S. Space & Defense (NTS Technical Systems)

Address:

4603B Compass Point Rd,
Belcamp, MD. 21017

Name and Telephone Number of the EOPS-Certified Laboratory staff person to be contacted regarding this report:

Joshua Petty – 667.289.8808

Date of Test: 18 February 2026 **Time of Test: 6:00 AM**

Locations(s) of Test, including any off-site locations:

Element U.S. Space & Defense
4603B Compass Point Rd,
Belcamp, MD, 21017

Name(s) and Title(s) of EOPS-Certified Laboratory Staff who conducted and/or performed the required testing:

1. Jacob Arisman- Range Lead
2. Adam Beach- Range Technician
3. Jason Easton- Range Technician

HANDGUN MANUFACTURER INFORMATION

Name and address of manufacturer:

Springfield Armory
650 Weber Dr.
Geneseo, IL 61254 USA

Name and address of entity submitting handguns for testing, if different:

HANDGUN MODEL INFORMATION

Handgun Type (check one): **Revolver:** _____ **Pistol:** ___X____

Make: Springfield Armory

Model: PX9117LAOS

Caliber: 9mm **Barrel Length:** 4.25"

Construction Material(s) for frame, barrel, cylinder, slide, and breechblock (e.g., stainless steel, alloy):
Forged Stainless steel

Serial Numbers:

1. LW188760
2. LW188749
3. LW188809
4. LW188450
5. LW188761

The manufacturer has certified in writing (attached) that each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way, and has been pre-tested only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

Yes __X__ **No** ____

If the handgun has been submitted by an importer, then the importer has certified in writing (attached) that each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way, and has been pre-tested only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

Yes____ **No** ____

AMMUNITION/TEST LOAD INFORMATION

Ammunition Manufacturer: Winchester

Caliber: 9mm

Bullet Weight and Type (i.e., FMJ, JHP, etc.): 9mm 115 gr FMJ

Lot #: L45WF70

Used most powerful ammunition recommended in manufacturer's user manual:

Yes __X__ **No**_____

Used Primed case for Drop Safety Test Most Similar to the Most Powerful Ammunition Recommended in Manufacturer's User Manual:

Yes __X__ **No**_____

Primed Case Manufacturer: Winchester

FIRING TEST

Each of three handguns have met both of the following conditions as set forth in M.G.L. c. 140 § 123 cl. (18):

Fired the first 20 rounds without a malfunction.

Fired the full 600 rounds with no more than 6 malfunctions and completed the test without a crack or breakage that increases the danger to the user.

DROP SAFETY TEST

Each of 5 handguns was dropped onto a solid concrete slab from a height of 1 meter and did not discharge during any of the following drop tests as set forth in M.G.L. c. 140, § 123 cl. (19):

Drop #1: Normal firing position (barrel horizontal)

Drop #2: Upside down (barrel horizontal)

Drop #3: On grip (barrel vertical)

Drop #4: On muzzle (barrel vertical)

Drop #5: On either side (barrel horizontal)

Drop #6: On exposed hammer or striker or, if none exist, on the rearmost part of the firearm.

Please note that all handguns should be tested with all manual safety off in each available hammer position. For instance, with traditional double action pistols and revolvers with exposed hammers, six drops must be done both with the hammer cocked back and in the forward position. Similarly, handguns that have a half-cocked position should be tested with the hammer cocked back, the hammer in forward position, and the hammer half-cocked.

Before each drop, the handgun must be test fired to ensure functionality.

SAFETY REQUIREMENTS as set forth in M.G.L. c. 140 § 123 cl. (20), (21

ALL HANDGUNS

Handgun is not prone to either:

Firing more than once per pull of the trigger

Explosion during firing

I declare under penalty of perjury according to the laws of the Massachusetts that this test was performed pursuant to the requirements of M.G.L. c. 140, § 123 cl. (19), 501 CMR 7.00, as further outlined in the Secretary's February 21, 2001 letter, and that all statements made in this report are true and complete

Signature: John A Petty

Name/Title (Printed): Joshua Petty Ballistics Engineering Specialist

Date: 06 March 2026

MANUFACTURER'S HANDGUN CERTIFICATION FORM

Approved Firearms Roster
M.G.L. c. 140, sec. 123, cl. 18-21; 501 CMR 7.00

This form must be completed by the importer.

The following handgun samples, which accompany this Certification, are submitted for testing for purposes of the Approved Firearms Roster, M.G.L. c. 140, sec. 123, cl. 18-21, and 501 CMR 7.00:

Manufacturer: Springfield Armory

Model: PX9117LAOS

Caliber: 9mm

Serial No.:

1. LW188760
2. LW188749
3. LW188809
4. LW188450
5. LW188761

Laboratory Reference Number: PH00018277A

The undersigned manufacturer certifies that:

Each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way; and

Each handgun identified above has been pre-tested by the manufacturer only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

I declare under penalty of perjury according to the laws of the Massachusetts that this test was performed pursuant to the requirements of M.G.L. c. 140, § 123 cl. (19), 501 CMR 7.00, as further outlined in the Secretary's February 21, 2001 letter, and that all statements made in this report are true and complete

Signature: Donna J Rahn

Name/Title (Printed): Donna J Rahn, Executive Administrator

Date: 3-13-26

Element U.S. Space & Defense Test Report

Project No.: PH00018277D Tested: 20 February 2026

Prepared For

Springfield Armory
650 Weber Dr.
Geneseo, IL 61254 USA

Prepared By

Element U.S. Space & Defense | 4603B Compass Point Road | Belcamp, MD 21017 | (410) 297-8154 |
www.elementdefense.com

Revision History

Rev.	Description	Issue Date
0	Initial Release	06 March 2026

The EOPS-Certified Laboratory identified below has completed the testing requirements by Massachusetts General Law c. 140 § 123 cl. 18-21 and is submitting this Compliance Test Report. The reference number/identifier should refer specifically to the testing of a named handgun model, not to the laboratory in general. The number/identifier must be noted in the space provided on each page of this report.

EOPS-CERTIFIED LABORATORY INFORMATION

Date Submitted: March 06, 2026

EOPS-Certified Laboratory: Element U.S. Space & Defense (NTS Technical Systems)

Address:

4603B Compass Point Rd,
Belcamp, MD, 21017

Name and Telephone Number of the EOPS-Certified Laboratory staff person to be contacted regarding this report:

Joshua Petty – 667.289.8808

Date of Test: 20 February 2026 **Time of Test: 6:00 AM**

Locations(s) of Test, including any off-site locations:

Element U.S. Space & Defense
4603B Compass Point Rd,
Belcamp, MD, 21017

Name(s) and Title(s) of EOPS-Certified Laboratory Staff who conducted and/or performed the required testing:

1. Jacob Arisman- Range Lead
2. Adam Beach- Range Technician
3. Jason Easton- Range Technician

HANDGUN MANUFACTURER INFORMATION

Name and address of manufacturer:

Springfield Armory
650 Weber Dr.
Geneseo, IL 61254 USA

Name and address of entity submitting handguns for testing, if different:

HANDGUN MODEL INFORMATION

Handgun Type (check one): **Revolver:** _____ **Pistol:** ___X___

Make: Springfield Armory

Model: PX9119LAOS

Caliber: 9mm **Barrel Length:** 5"

Construction Material(s) for frame, barrel, cylinder, slide, and breechblock (e.g., stainless steel, alloy):
Forged Stainless steel

Serial Numbers:

1. NM995734
2. NM996963
3. NM995792
4. NM996965
5. NM995779

The manufacturer has certified in writing (attached) that each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way, and has been pre-tested only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

Yes __X__ **No** ____

If the handgun has been submitted by an importer, then the importer has certified in writing (attached) that each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way, and has been pre-tested only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

Yes____ **No** ____

AMMUNITION/TEST LOAD INFORMATION

Ammunition Manufacturer: Winchester

Caliber: 9mm

Bullet Weight and Type (i.e., FMJ, JHP, etc.): 9mm 115 gr FMJ

Lot #: L46WF81

Used most powerful ammunition recommended in manufacturer's user manual:

Yes ___X___ **No**_____

Used Primed case for Drop Safety Test Most Similar to the Most Powerful Ammunition Recommended in Manufacturer's User Manual:

Yes ___X___ **No**_____

Primed Case Manufacturer: Winchester

FIRING TEST

Each of three handguns have met both of the following conditions as set forth in M.G.L. c. 140 § 123 cl. (18):

Fired the first 20 rounds without a malfunction.

Fired the full 600 rounds with no more than 6 malfunctions and completed the test without a crack or breakage that increases the danger to the user.

DROP SAFETY TEST

Each of 5 handguns was dropped onto a solid concrete slab from a height of 1 meter and did not discharge during any of the following drop tests as set forth in M.G.L. c. 140, § 123 cl. (19):

Drop #1: Normal firing position (barrel horizontal)

Drop #2: Upside down (barrel horizontal)

Drop #3: On grip (barrel vertical)

Drop #4: On muzzle (barrel vertical)

Drop #5: On either side (barrel horizontal)

Drop #6: On exposed hammer or striker or, if none exist, on the rearmost part of the firearm.

Please note that all handguns should be tested with all manual safety off in each available hammer position. For instance, with traditional double action pistols and revolvers with exposed hammers, six drops must be done both with the hammer cocked back and in the forward position. Similarly, handguns that have a half-cocked position should be tested with the hammer cocked back, the hammer in forward position, and the hammer half-cocked.

Before each drop, the handgun must be test fired to ensure functionality.

SAFETY REQUIREMENTS as set forth in M.G.L. c. 140 § 123 cl. (20), (21

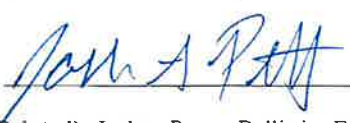
ALL HANDGUNS

Handgun is not prone to either:

Firing more than once per pull of the trigger

Explosion during firing

I declare under penalty of perjury according to the laws of the Massachusetts that this test was performed pursuant to the requirements of M.G.L. c. 140, § 123 cl. (19), 501 CMR 7.00, as further outlined in the Secretary's February 21, 2001 letter, and that all statements made in this report are true and complete

Signature: 

Name/Title (Printed): Joshua Petty Ballistics Engineering Specialist

Date: 06 March 2026

MANUFACTURER'S HANDGUN CERTIFICATION FORM

Approved Firearms Roster
M.G.L. c. 140, sec. 123, cl. 18-21; 501 CMR 7.00

This form must be completed by the importer.

The following handgun samples, which accompany this Certification, are submitted for testing for purposes of the Approved Firearms Roster, M.G.L. c. 140, sec. 123, cl. 18-21, and 501 CMR 7.00:

Manufacturer: Springfield Armory

Model: PX9119LAOS

Caliber: 9mm

Serial No.:

1. NM995734
2. NM996963
3. NM995792
4. NM996965
5. NM995779

Laboratory Reference Number: PH00018277D

The undersigned manufacturer certifies that:

Each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way; and

Each handgun identified above has been pre-tested by the manufacturer only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

I declare under penalty of perjury according to the laws of the Massachusetts that this test was performed pursuant to the requirements of M.G.L. c. 140, § 123 cl. (19), 501 CMR 7.00, as further outlined in the Secretary's February 21, 2001 letter, and that all statements made in this report are true and complete

Signature: Donna J Rahn

Name/Title (Printed): Donna J. Rahn, Executive Administrator

Date: 3-13-20

Element U.S. Space & Defense Test Report

Project No.: PH00018277C Tested: 19 February 2026

Prepared For

Springfield Armory
650 Weber Dr.
Geneseo, IL 61254 USA

Prepared By

Element U.S. Space & Defense | 4603B Compass Point Road | Belcamp, MD 21017 | (410) 297-8154 |
www.elementdefense.com

Revision History

Rev.	Description	Issue Date
0	Initial Release	06 March 2026

The EOPS-Certified Laboratory identified below has completed the testing requirements by Massachusetts General Law c. 140 § 123 cl. 18-21 and is submitting this Compliance Test Report. The reference number/identifier should refer specifically to the testing of a named handgun model, not to the laboratory in general. The number/identifier must be noted in the space provided on each page of this report.

EOPS-CERTIFIED LABORATORY INFORMATION

Date Submitted: March 06, 2026

EOPS-Certified Laboratory: Element U.S. Space & Defense (NTS Technical Systems)

Address:

4603B Compass Point Rd,
Belcamp, MD, 21017

Name and Telephone Number of the EOPS-Certified Laboratory staff person to be contacted regarding this report:

Joshua Petty – 667.289.8808

Date of Test: 19 February 2026 **Time of Test: 8:00 AM**

Locations(s) of Test, including any off-site locations:

Element U.S. Space & Defense
4603B Compass Point Rd,
Belcamp, MD, 21017

Name(s) and Title(s) of EOPS-Certified Laboratory Staff who conducted and/or performed the required testing:

1. Jacob Arisman- Range Lead
2. Adam Beach- Range Technician
3. Jason Easton- Range Technician

HANDGUN MANUFACTURER INFORMATION

Name and address of manufacturer:

Springfield Armory
650 Weber Dr.
Geneseo, IL 61254 USA

Name and address of entity submitting handguns for testing, if different:

HANDGUN MODEL INFORMATION

Handgun Type (check one): **Revolver:** _____ **Pistol:** __X___

Make: Springfield Armory

Model: PX9123L

Caliber: 9mm **Barrel Length:** 3"

Construction Material(s) for frame, barrel, cylinder, slide, and breechblock (e.g., stainless steel, alloy):
Forged Stainless steel

Serial Numbers:

1. EMP108125
2. EMP108162
3. EMP108164
4. EMP108170
5. EMP108183

The manufacturer has certified in writing (attached) that each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way, and has been pre-tested only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

Yes __X__ **No** ____

If the handgun has been submitted by an importer, then the importer has certified in writing (attached) that each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way, and has been pre-tested only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

Yes____ **No** ____

AMMUNITION/TEST LOAD INFORMATION

Ammunition Manufacturer: Winchester

Caliber: 9mm

Bullet Weight and Type (i.e., FMJ, JHP, etc.): 9mm 115 gr FMJ

Lot #: L18WF81

Used most powerful ammunition recommended in manufacturer's user manual:

Yes ___X___ **No**_____

Used Primed case for Drop Safety Test Most Similar to the Most Powerful Ammunition Recommended in Manufacturer's User Manual:

Yes ___X___ **No**_____

Primed Case Manufacturer: Winchester

FIRING TEST

Each of three handguns have met both of the following conditions as set forth in M.G.L. c. 140 § 123 cl. (18):

Fired the first 20 rounds without a malfunction.

Fired the full 600 rounds with no more than 6 malfunctions and completed the test without a crack or breakage that increases the danger to the user.

DROP SAFETY TEST

Each of 5 handguns was dropped onto a solid concrete slab from a height of 1 meter and did not discharge during any of the following drop tests as set forth in M.G.L. c. 140, § 123 cl. (19):

Drop #1: Normal firing position (barrel horizontal)

Drop #2: Upside down (barrel horizontal)

Drop #3: On grip (barrel vertical)

Drop #4: On muzzle (barrel vertical)

Drop #5: On either side (barrel horizontal)

Drop #6: On exposed hammer or striker or, if none exist, on the rearmost part of the firearm.

Please note that all handguns should be tested with all manual safety off in each available hammer position. For instance, with traditional double action pistols and revolvers with exposed hammers, six drops must be done both with the hammer cocked back and in the forward position. Similarly, handguns that have a half-cocked position should be tested with the hammer cocked back, the hammer in forward position, and the hammer half-cocked.

Before each drop, the handgun must be test fired to ensure functionality.

SAFETY REQUIREMENTS as set forth in M.G.L. c. 140 § 123 cl. (20), (21

ALL HANDGUNS

Handgun is not prone to either:

Firing more than once per pull of the trigger

Explosion during firing

I declare under penalty of perjury according to the laws of the Massachusetts that this test was performed pursuant to the requirements of M.G.L. c. 140, § 123 cl. (19), 501 CMR 7.00, as further outlined in the Secretary's February 21, 2001 letter, and that all statements made in this report are true and complete

Signature: Josh A Petty

Name/Title (Printed): Joshua Petty Ballistics Engineering Specialist

Date: 06 March 2026

MANUFACTURER'S HANDGUN CERTIFICATION FORM

Approved Firearms Roster
M.G.L. c. 140, sec. 123, cl. 18-21; 501 CMR 7.00

This form must be completed by the importer.

The following handgun samples, which accompany this Certification, are submitted for testing for purposes of the Approved Firearms Roster, M.G.L. c. 140, sec. 123, cl. 18-21, and 501 CMR 7.00:

Manufacturer: Springfield Armory

Model: PX9123L

Caliber: 9mm

Serial No.:

1. EMP108125
2. EMP108162
3. EMP108164
4. EMP108170
5. EMP108183

Laboratory Reference Number: PH00018277C

The undersigned manufacturer certifies that:

Each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way; and

Each handgun identified above has been pre-tested by the manufacturer only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

I declare under penalty of perjury according to the laws of the Massachusetts that this test was performed pursuant to the requirements of M.G.L. c. 140, § 123 cl. (19), 501 CMR 7.00, as further outlined in the Secretary's February 21, 2001 letter, and that all statements made in this report are true and complete

Signature: Donna J Rahn

Name/Title (Printed): Donna J. Rahn, Executive Administrator

Date: 3/13/26

Element U.S. Space & Defense Test Report

Project No.: PH00018277B Tested: 18 February 2026

Prepared For

Springfield Armory
650 Weber Dr.
Geneseo, IL 61254 USA

Prepared By

Element U.S. Space & Defense | 4603B Compass Point Road | Belcamp, MD 21017 | (410) 297-8154 |
www.elementdefense.com

Revision History

Rev.	Description	Issue Date
0	Initial Release	06 March 2026

The EOPS-Certified Laboratory identified below has completed the testing requirements by Massachusetts General Law c. 140 § 123 cl. 18-21 and is submitting this Compliance Test Report. The reference number/identifier should refer specifically to the testing of a named handgun model, not to the laboratory in general. The number/identifier must be noted in the space provided on each page of this report.

EOPS-CERTIFIED LABORATORY INFORMATION

Date Submitted: March 06, 2026

EOPS-Certified Laboratory: Element U.S. Space & Defense (NTS Technical Systems)

Address:

4603B Compass Point Rd,
Belcamp, MD, 21017

Name and Telephone Number of the EOPS-Certified Laboratory staff person to be contacted regarding this report:

Joshua Petty – 667.289.8808

Date of Test: 18 February 2026 **Time of Test: 10:00 AM**

Locations(s) of Test, including any off-site locations:

Element U.S. Space & Defense
4603B Compass Point Rd,
Belcamp, MD, 21017

Name(s) and Title(s) of EOPS-Certified Laboratory Staff who conducted and/or performed the required testing:

1. Jacob Arisman- Range Lead
2. Adam Beach- Range Technician
3. Jason Easton- Range Technician

HANDGUN MANUFACTURER INFORMATION

Name and address of manufacturer:

Springfield Armory
650 Weber Dr.
Geneseo, IL 61254 USA

Name and address of entity submitting handguns for testing, if different:

HANDGUN MODEL INFORMATION

Handgun Type (check one): **Revolver:** _____ **Pistol:** ___X___

Make: Springfield Armory

Model: PX9124L

Caliber: 9mm **Barrel Length:** 4"

Construction Material(s) for frame, barrel, cylinder, slide, and breechblock (e.g., stainless steel, alloy):
Forged Stainless steel

Serial Numbers:

1. EMP106848
2. EMP106792
3. EMP106863
4. EMP106850
5. EMP106797

The manufacturer has certified in writing (attached) that each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way, and has been pre-tested only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

Yes __X__ **No** ___

If the handgun has been submitted by an importer, then the importer has certified in writing (attached) that each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way, and has been pre-tested only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

Yes____ **No** ____

AMMUNITION/TEST LOAD INFORMATION

Ammunition Manufacturer: Winchester

Caliber: 9mm

Bullet Weight and Type (i.e., FMJ, JHP, etc.): 9mm 115 gr FMJ

Lot #: L18WF81

Used most powerful ammunition recommended in manufacturer's user manual:

Yes ___X___ No_____

Used Primed case for Drop Safety Test Most Similar to the Most Powerful Ammunition Recommended in Manufacturer's User Manual:

Yes ___X___ No_____

Primed Case Manufacturer: Winchester

FIRING TEST

Each of three handguns have met both of the following conditions as set forth in M.G.L. c. 140 § 123 cl. (18):

Fired the first 20 rounds without a malfunction.

Fired the full 600 rounds with no more than 6 malfunctions and completed the test without a crack or breakage that increases the danger to the user.

DROP SAFETY TEST

Each of 5 handguns was dropped onto a solid concrete slab from a height of 1 meter and did not discharge during any of the following drop tests as set forth in M.G.L. c. 140, § 123 cl. (19):

Drop #1: Normal firing position (barrel horizontal)

Drop #2: Upside down (barrel horizontal)

Drop #3: On grip (barrel vertical)

Drop #4: On muzzle (barrel vertical)

Drop #5: On either side (barrel horizontal)

Drop #6: On exposed hammer or striker or, if none exist, on the rearmost part of the firearm.

Please note that all handguns should be tested with all manual safety off in each available hammer position. For instance, with traditional double action pistols and revolvers with exposed hammers, six drops must be done both with the hammer cocked back and in the forward position. Similarly, handguns that have a half-cocked position should be tested with the hammer cocked back, the hammer in forward position, and the hammer half-cocked.

Before each drop, the handgun must be test fired to ensure functionality.

SAFETY REQUIREMENTS as set forth in M.G.L. c. 140 § 123 cl. (20), (21

ALL HANDGUNS

Handgun is not prone to either:

Firing more than once per pull of the trigger

Explosion during firing

I declare under penalty of perjury according to the laws of the Massachusetts that this test was performed pursuant to the requirements of M.G.L. c. 140, § 123 cl. (19), 501 CMR 7.00, as further outlined in the Secretary's February 21, 2001 letter, and that all statements made in this report are true and complete

Signature: Josh A Petty

Name/Title (Printed): Joshua Petty Ballistics Engineering Specialist

Date: 06 March 2026

MANUFACTURER'S HANDGUN CERTIFICATION FORM

Approved Firearms Roster
M.G.L. c. 140, sec. 123, cl. 18-21; 501 CMR 7.00

This form must be completed by the importer.

The following handgun samples, which accompany this Certification, are submitted for testing for purposes of the Approved Firearms Roster, M.G.L. c. 140, sec. 123, cl. 18-21, and 501 CMR 7.00:

Manufacturer: Springfield Armory

Model: PX9124L

Caliber: 9mm

Serial No.:

1. EMP106848
2. EMP106792
3. EMP106863
4. EMP106850
5. EMP106797

Laboratory Reference Number: PH00018277B

The undersigned manufacturer certifies that:

Each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way; and

Each handgun identified above has been pre-tested by the manufacturer only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

I declare under penalty of perjury according to the laws of the Massachusetts that this test was performed pursuant to the requirements of M.G.L. c. 140, § 123 cl. (19), 501 CMR 7.00, as further outlined in the Secretary's February 21, 2001 letter, and that all statements made in this report are true and complete

Signature: Donna J. Rahn

Name/Title (Printed): Donna J. Rahn, Executive Administrator

Date: 3-13-26

Element U.S. Space & Defense Test Report

Project No.: PH00018462 Tested: 25 March 2026

Prepared For

Springfield Armory
650 Weber Dr.
Geneseo, IL 61254 USA

Prepared By

Element U.S. Space & Defense | 4603B Compass Point Road | Belcamp, MD 21017 | (410) 297-8154 |
www.elementdefense.com

Revision History

Rev.	Description	Issue Date
0	Initial Release	31 March 2026

The EOPS-Certified Laboratory identified below has completed the testing requirements by Massachusetts General Law c. 140 § 123 cl. 18-21 and is submitting this Compliance Test Report. The reference number/identifier should refer specifically to the testing of a named handgun model, not to the laboratory in general. The number/identifier must be noted in the space provided on each page of this report.

EOPS-CERTIFIED LABORATORY INFORMATION

Date Submitted: March 31, 2026

EOPS-Certified Laboratory: Element U.S. Space & Defense (NTS Technical Systems)

Address:

4603B Compass Point Rd,
Belcamp, MD, 21017

Name and Telephone Number of the EOPS-Certified Laboratory staff person to be contacted regarding this report:

Joshua Petty – 667.289.8808

Date of Test: 25 March 2026 **Time of Test: 8:00 AM**

Locations(s) of Test, including any off-site locations:

Element U.S. Space & Defense
4603B Compass Point Rd,
Belcamp, MD, 21017

Name(s) and Title(s) of EOPS-Certified Laboratory Staff who conducted and/or performed the required testing:

1. Jacob Arisman- Range Lead
2. Joshua Petty- Ballistic Engineering Specialist
3. Jason Easton- Range Technician

HANDGUN MANUFACTURER INFORMATION

Name and address of manufacturer:

Springfield Armory
650 Weber Dr.
Geneseo, IL 61254 USA

Name and address of entity submitting handguns for testing, if different:

HANDGUN MODEL INFORMATION

Handgun Type (check one): **Revolver: _____** **Pistol: __X___**

Make: Springfield Armory

Model: PC9105LCA18

Caliber: .45 ACP **Barrel Length:** 5"

Construction Material(s) for frame, barrel, cylinder, slide, and breechblock (e.g., stainless steel, alloy):
Stainless steel

Serial Numbers:

1. NM1003120
2. NM1003141
3. NM1003140
4. NM1003128
5. NM1003142

The manufacturer has certified in writing (attached) that each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way, and has been pre-tested only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

Yes __X__ No ____

If the handgun has been submitted by an importer, then the importer has certified in writing (attached) that each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way, and has been pre-tested only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

Yes_____ No ____

AMMUNITION/TEST LOAD INFORMATION

Ammunition Manufacturer: Federal

Caliber: .45

Bullet Weight and Type (i.e., FMJ, JHP, etc.): .45 Auto 230 gr. FMJ

Lot #: 41V52G547V61

Used most powerful ammunition recommended in manufacturer's user manual:

Yes ___X___ **No**_____

Used Primed case for Drop Safety Test Most Similar to the Most Powerful Ammunition Recommended in Manufacturer's User Manual:

Yes ___X___ **No**_____

Primed Case Manufacturer: Federal

FIRING TEST

Each of three handguns have met both of the following conditions as set forth in M.G.L. c. 140 § 123 cl. (18):

Fired the first 20 rounds without a malfunction.

Fired the full 600 rounds with no more than 6 malfunctions and completed the test without a crack or breakage that increases the danger to the user.

DROP SAFETY TEST

Each of 5 handguns was dropped onto a solid concrete slab from a height of 1 meter and did not discharge during any of the following drop tests as set forth in M.G.L. c. 140, § 123 cl. (19):

Drop #1: Normal firing position (barrel horizontal)

Drop #2: Upside down (barrel horizontal)

Drop #3: On grip (barrel vertical)

Drop #4: On muzzle (barrel vertical)

Drop #5: On either side (barrel horizontal)

Drop #6: On exposed hammer or striker or, if none exist, on the rearmost part of the firearm.

Please note that all handguns should be tested with all manual safety off in each available hammer position. For instance, with traditional double action pistols and revolvers with exposed hammers, six drops must be done both with the hammer cocked back and in the forward position. Similarly, handguns that have a half-cocked position should be tested with the hammer cocked back, the hammer in forward position, and the hammer half-cocked.

Before each drop, the handgun must be test fired to ensure functionality.

SAFETY REQUIREMENTS as set forth in M.G.L. c. 140 § 123 cl. (20), (21

ALL HANDGUNS

Handgun is not prone to either:

Firing more than once per pull of the trigger

Explosion during firing

I declare under penalty of perjury according to the laws of the Massachusetts that this test was performed pursuant to the requirements of M.G.L. c. 140, § 123 cl. (19), 501 CMR 7.00, as further outlined in the Secretary's February 21, 2001 letter, and that all statements made in this report are true and complete

Signature: John A Petty

Name/Title (Printed): Joshua Petty · Ballistics Engineering Specialist

Date: 31 March 2026

MANUFACTURER'S HANDGUN CERTIFICATION FORM

Approved Firearms Roster
M.G.L. c. 140, sec. 123, cl. 18-21; 501 CMR 7.00

This form must be completed by the importer.

The following handgun samples, which accompany this Certification, are submitted for testing for purposes of the Approved Firearms Roster, M.G.L. c. 140, sec. 123, cl. 18-21, and 501 CMR 7.00:

Manufacturer: Springfield Armory

Model: PC9105LCA18

Caliber: .45

Serial No.:

1. NM1003120
2. NM1003141
3. NM1003140
4. NM1003128
5. NM1003142

Laboratory Reference Number: PH00018462

The undersigned manufacturer certifies that:

Each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way; and

Each handgun identified above has been pre-tested by the manufacturer only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

I declare under penalty of perjury according to the laws of the Massachusetts that this test was performed pursuant to the requirements of M.G.L. c. 140, § 123 cl. (19), 501 CMR 7.00, as further outlined in the Secretary's February 21, 2001 letter, and that all statements made in this report are true and complete

Signature: Donna J Rahn

Name/Title (Printed): Donna J Rahn, Executive Administrator

Date: 4-2-26

Element U.S. Space & Defense Test Report

Project No.: PH00018570 Tested: 24 March 2026

Prepared For

Springfield Armory
650 Weber Dr.
Geneseo, IL 61254 USA

Prepared By
Element U.S. Space & Defense | 4603B Compass Point Road | Belcamp, MD 21017 | (410) 297-8154 |
www.elementdefense.com

Revision History

Rev.	Description	Issue Date
0	Initial Release	31 March 2026

The EOPS-Certified Laboratory identified below has completed the testing requirements by Massachusetts General Law c. 140 § 123 cl. 18-21 and is submitting this Compliance Test Report. The reference number/identifier should refer specifically to the testing of a named handgun model, not to the laboratory in general. The number/identifier must be noted in the space provided on each page of this report.

EOPS-CERTIFIED LABORATORY INFORMATION

Date Submitted: March 31, 2026

EOPS-Certified Laboratory: Element U.S. Space & Defense (NTS Technical Systems)

Address:

4603B Compass Point Rd,
Belcamp, MD, 21017

Name and Telephone Number of the EOPS-Certified Laboratory staff person to be contacted regarding this report:

Joshua Petty – 667.289.8808

Date of Test: 24 March 2026 **Time of Test: 8:00 AM**

Locations(s) of Test, including any off-site locations:

Element U.S. Space & Defense
4603B Compass Point Rd,
Belcamp, MD, 21017

Name(s) and Title(s) of EOPS-Certified Laboratory Staff who conducted and/or performed the required testing:

1. Jacob Arisman- Range Lead
2. Adam Beach- Range Technician
3. Jason Easton- Range Technician

HANDGUN MANUFACTURER INFORMATION

Name and address of manufacturer:

Springfield Armory
650 Weber Dr.
Geneseo, IL 61254 USA

Name and address of entity submitting handguns for testing, if different:

HANDGUN MODEL INFORMATION

Handgun Type (check one): **Revolver:** _____ **Pistol:** ___X____

Make: Springfield Armory

Model: XDDG9101BLC-M4

Caliber: 9mm **Barrel Length:** 4.0"

Construction Material(s) for frame, barrel, cylinder, slide, and breechblock (e.g., stainless steel, alloy):
Stainless steel, Polymer

Serial Numbers:

1. BL140905
2. BL140926
3. BL140957
4. BL140901
5. BL140914

The manufacturer has certified in writing (attached) that each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way, and has been pre-tested only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

Yes __X__ **No** ____

If the handgun has been submitted by an importer, then the importer has certified in writing (attached) that each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way, and has been pre-tested only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

Yes_____ **No** ____

AMMUNITION/TEST LOAD INFORMATION

Ammunition Manufacturer: Federal

Caliber: 9mm

Bullet Weight and Type (i.e., FMJ, JHP, etc.): 9mm 115 gr. FMJ

Lot #: G716U43-G717V62

Used most powerful ammunition recommended in manufacturer's user manual:

Yes ___X___ **No**_____

Used Primed case for Drop Safety Test Most Similar to the Most Powerful Ammunition Recommended in Manufacturer's User Manual:

Yes ___X___ **No**_____

Primed Case Manufacturer: Federal

FIRING TEST

Each of three handguns have met both of the following conditions as set forth in M.G.L. c. 140 § 123 cl. (18):

Fired the first 20 rounds without a malfunction.

Fired the full 600 rounds with no more than 6 malfunctions and completed the test without a crack or breakage that increases the danger to the user.

DROP SAFETY TEST

Each of 5 handguns was dropped onto a solid concrete slab from a height of 1 meter and did not discharge during any of the following drop tests as set forth in M.G.L. c. 140, § 123 cl. (19):

Drop #1: Normal firing position (barrel horizontal)

Drop #2: Upside down (barrel horizontal)

Drop #3: On grip (barrel vertical)

Drop #4: On muzzle (barrel vertical)

Drop #5: On either side (barrel horizontal)

Drop #6: On exposed hammer or striker or, if none exist, on the rearmost part of the firearm.

Please note that all handguns should be tested with all manual safety off in each available hammer position. For instance, with traditional double action pistols and revolvers with exposed hammers, six drops must be done both with the hammer cocked back and in the forward position. Similarly, handguns that have a half-cocked position should be tested with the hammer cocked back, the hammer in forward position, and the hammer half-cocked.

Before each drop, the handgun must be test fired to ensure functionality.

SAFETY REQUIREMENTS as set forth in M.G.L. c. 140 § 123 cl. (20), (21

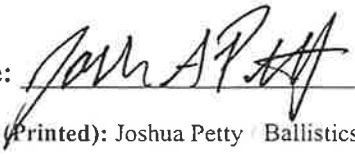
ALL HANDGUNS

Handgun is not prone to either:

Firing more than once per pull of the trigger

Explosion during firing

I declare under penalty of perjury according to the laws of the Massachusetts that this test was performed pursuant to the requirements of M.G.L. c. 140, § 123 cl. (19), 501 CMR 7.00, as further outlined in the Secretary's February 21, 2001 letter, and that all statements made in this report are true and complete

Signature: 

Name/Title (Printed): Joshua Petty Ballistics Engineering Specialist

Date: 31 March 2026

MANUFACTURER'S HANDGUN CERTIFICATION FORM

Approved Firearms Roster
M.G.L. c. 140, sec. 123, cl. 18-21; 501 CMR 7.00

This form must be completed by the importer.

The following handgun samples, which accompany this Certification, are submitted for testing for purposes of the Approved Firearms Roster, M.G.L. c. 140, sec. 123, cl. 18-21, and 501 CMR 7.00:

Manufacturer: Springfield Armory

Model: XDDG9101BLC-M4

Caliber: 9mm

Serial No.:

1. BL140905
2. BL140926
3. BL140957
4. BL140901
5. BL140914

Laboratory Reference Number: PH00018570

The undersigned manufacturer certifies that:

Each handgun identified above is the same as that sold or to be sold commercially to the public in the normal course, and is not modified in any way; and

Each handgun identified above has been pre-tested by the manufacturer only to the extent that each specimen of such model is tested prior to being sold commercially to the public in the normal course.

I declare under penalty of perjury according to the laws of the Massachusetts that this test was performed pursuant to the requirements of M.G.L. c. 140, § 123 cl. (19), 501 CMR 7.00, as further outlined in the Secretary's February 21, 2001 letter, and that all statements made in this report are true and complete

Signature: Donna J Rahn

Name/Title (Printed): Donna J Rahn, Executive Administrator

Date: 4-2-26

Susquehanna Labs

Overview – 24 March 2026

About Us

- State-of-the-Art Indoor Ballistic Facilities; Purpose Built Location & Buildings
- Owned and Operated by Steve McDowell & Mike Hinder
  - 20+ Years of Industry Experience
- Dedicated to Ease-of-Doing-Business
- Incorporation of the Best of Big & Small Business Principles
  - Big Business Capabilities & Service Offerings
  - Big Business Software Platforms & Processes
  - Small Business Customer Experience
  - Small Business Employee Experience

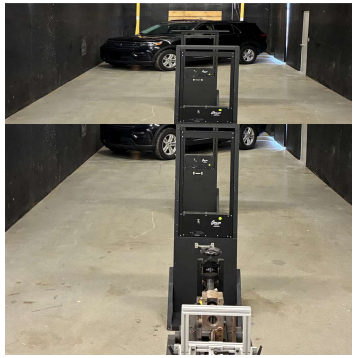
SUSQUEHANNA LABS

Company Purpose

Trusted Testing for Trusted Products

Susquehanna Labs – Capability Overview

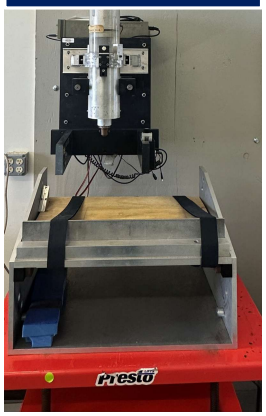
State-of-the-Art Indoor Ballistics Range



30-yd & 300-rd Outdoor Ranges

FARO Quantum S

Stab Tower



Cut & Sew Ability – Enhanced R&D Capability

ENV Conditioning – Hot / Cold / Humidity

STAARS

Specialized Laboratory Information Management System

SUSQUEHANNA LABS

SUSQUEHANNA LABS CONFIDENTIAL

Ballistic Capability - Overview

Body Armor

- NIJ Body Armor
- NIJ Tumbling
- Stab Testing

Hard Armor

- Drop Testing
- Env Cond / POL
- FARO Arm

Helmets

- NIJ Headforms
- Multi-Size Headforms
- FARO Arm

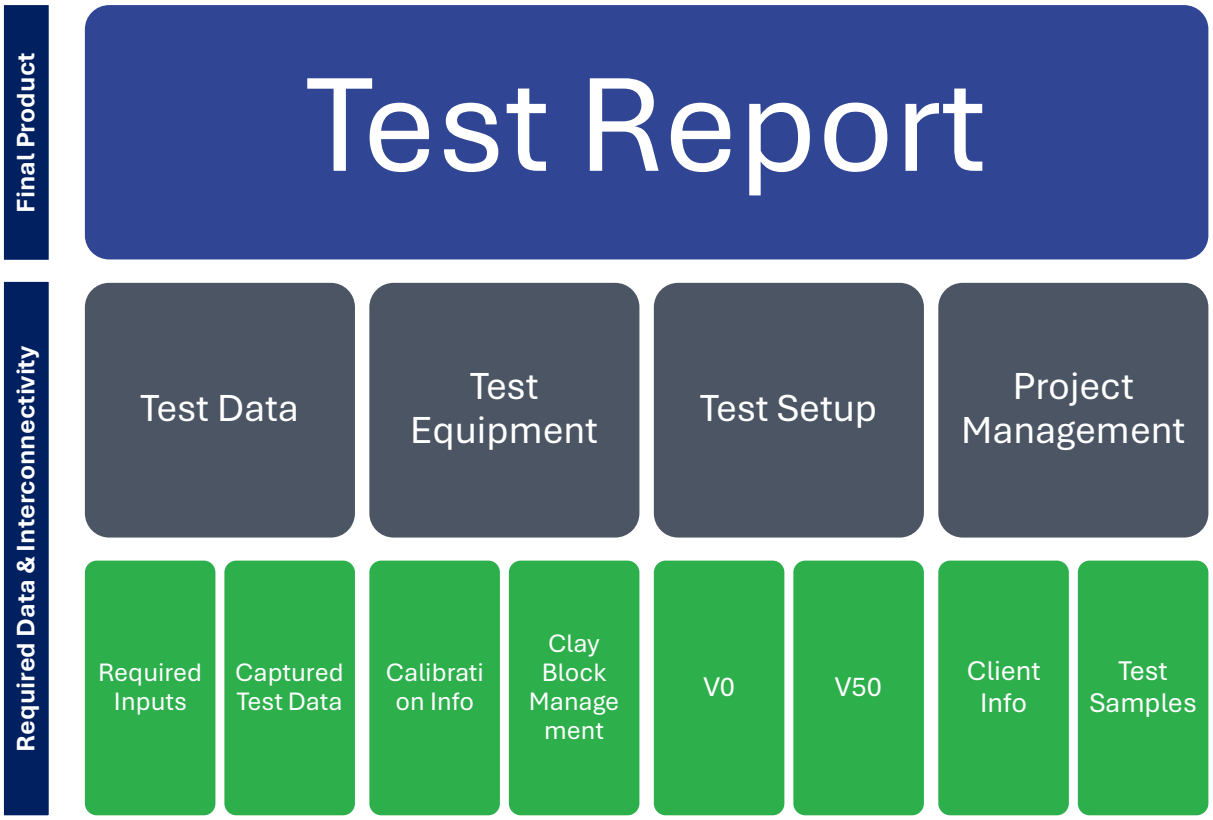
Additional Resources

- Large Caliber System
- Additional ENV Capabilities – ATC Outsourcing Contract

NVLAP Audit: Scheduled for 7-8 April

SUSQUEHANNA LABS

STAARS Overview



Susquehanna Testing Analysis and Reporting Suite (STAARS)

- Custom Developed, End-to-End Laboratory Information Management System (LIMS)
- Susquehanna Labs' system of record for all testing activities and reporting functions
- Specifically developed to drive value for BOTH clients and Susquehanna Labs
- Dedication to Continuous Improvement
  - Client feedback and welcomed & encouraged

SUSQUEHANNA LABS

STAARS Benefits

Advanced Clay Management

Automated Reporting

Consistency

Flexibility

Confidence

Check out our STAARS Blog for more detail!: https://www.susqlabs.com/blog/staars

Contracting & Certifications

Government Contracting:

- **UEI:** VFTYECR1Z153
- **Cage Code:** 17SX4
- **NAICS:** 541380 (Testing Laboratories & Services)

SAM.GOV®

- **State of Maryland – Certified Small Business**
  - **CSB Cert #:** SB26-092812

SMALL BUSINESS RESERVE SBR PROGRAM

SUSQUEHANNA LABS

Contact Information

Contact Info

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  - steve@susqlabs.com
  - 443-347-5934

Address

- 3114 Scarboro Rd. Street, MD, 21154

CAPABILITIES OVERVIEW

Company Overview

Susquehanna Labs was founded on the mission of providing trusted testing for trusted products. With state-of-the-art facilities, and a team of seasoned experts, we aim to deliver a transparent, repeatable, and reproducible testing experience. Our unwavering dedication to our clients and partners is driven by our passion for the industry, local community, and commitment to ease-of-doing-business.

Ballistic Testing

Range Overview: State-of-the-art, 80-ft Long, Indoor Ballistic Range. Ability to regulate BOTH range temperature & humidity

Threat Capabilities:

- 9-mm to 50-caliber projectiles (including Armor Piercing)
- Fragment Simulating Projectiles (FSPs)
- Right Circular Cylinders (RCCs)

Other Differentiators:

- Drive-in Capability – Large Samples, Vehicles
- Large Gun Capabilities (High Velocity 50-caliber, 14.5-mm, and 20-mm)
- Proprietary Test Management, Data Capture and Reporting Software – Susquehanna Testing Analysis and Reporting Suite (STAARS)

Firearms & Ammo Testing

Firearms & Ammo Testing Overview:

- Ability to perform firearms & ammunition testing in both indoor and outdoor environments
- Environmental Conditioning
- SAAMI Pressure & Velocity Testing

Specialized Equipment:

- Temperature & Humidity Chambers
- Infinity Doppler Radar
- Vibration / Shaker Table
- Drop Towers
- PCB Pressure Gauge (MOST CALIBERS)

CAPABILITIES OVERVIEW

Stab Testing

Stab Overview:

- Stab Drop Tower capable of performing testing to both the National Institute of Justice (NIJ) 0115.00 Standard and Home Office Body Armour Standard (2017)
- Tip Sharpness Testing Machine
- Ability to accommodate other R&D Stab Efforts & Threat Types

Outdoor Ranges

Outdoor Ranges Overview:

- 25-yard, 16 Bay Shooting Range
- 300-yard, 5 Bay Shooting Range with Additional Sniper Tower

Supported Testing Types:

- Forced Entry Testing
- Ballistic Testing – Full Vehicle or Large / Specialized Samples
- Weapons Qualifications
- Outdoor Range Rental

Our Team

Steve McDowell
Co-Founder

Steve brings over a decade of ballistic testing experience, beginning his career in 2011 as a range technician and advancing through roles including range supervisor, range manager, and Operations Manager. At Element-Belcamp, he oversaw a wide range of ballistic lab operations—from material preparation and daily testing activities to ensuring compliance with governing bodies. He contributed to major ballistic accreditations such as HOSDB, A2LA, NVLAP, and others.

Steve has been married for over 20 years and has 3 boys from college age to elementary school. He has a passion for coaching sports and being involved in his local church.

Mike Hinder
Co-Founder

Mike is a graduate from Villanova University and holds both a B.S. in Mechanical Engineering and an MBA with concentrations in Finance & Real Estate. Throughout his career, Mike's focus has been on supporting highly regulated industries (defense & medical) through consulting and leadership roles. Mike has spent over 10-years working in the ballistic testing community for Element – Belcamp, most recently leading the facility as their General Manager.

Outside of work Mike cherishes spending time with his wife and two young children. He also loves to get a round of golf in.